EXHIBIT R

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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

_____

IN RE MATTER OF:)

RICHARD KADREY, et al.,   )

Plaintiff,   )

vs.   ) C.A. NO.:

META PLATFORMS, INC.,   ) 3:23-cv-03417-VC

Defendant.   )

_____)

** HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY **

VIDEOTAPED DEPOSITION OF JOELLE PINEAU

Montreal, Quebec, Canada

Wednesday, November 6, 2024

Stenographically Reported by:

ANGELA JANSSEN, CSR,

Commissioner of Oaths

_____

DIGITAL EVIDENCE GROUP

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 1   MS. HARTNETT: Objection to the form.

 2   A.   I don't remember the specifics,

 3   but Genesis was essentially the precursor to

 4   LLaMA.

 5   (Stenographer clarifies)

 6   BY MR. YOUNG

 7   Q.   Did you have any -- scratch that.

 8   So when those individuals were

 9   working on the theorem proving project, they were

10   doing so under your supervision?

11   MS. HARTNETT: Objection to the form.

12   A.   Mostly under Antoine's

13   supervision and the late end of the project was

14   under my supervision.

15   BY MR. YOUNG

16   Q.   So would that be approximately

17   second half of 2022 when they went to your

18   supervision?

19   A.   Yeah. I would say Antoine and I

20   were jointly responsible for the research

21   strategy of the FAIR as a whole, though he was

22   responsible for the direct management of the

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 1   individuals.

 2   Q.   Did you have any responsibility

 3   over the datasets that those individuals used to

 4   train either the theorem proving project?

 5   MS. HARTNETT: Objection to form.

 6   A.   I was responsible from a

 7   strategic point of view and not necessarily

 8   responsible for direct approvals while they were

 9   not under my management chain. And then when

10   they became in my management chain, then I had

11   more oversight.

12   BY MR. YOUNG

13   Q.   Do you recall approximately when

14   in 2022 they became under your management chain?

15   A.   September or October, that time

16   frame.

17   Q.   After September, October 2022,

18   would it be fair to say that any datasets that

19   were to be used to train any of the models at

20   FAIR -- strike that.

21   Would it be fair to say after

22   September or October 2022 when those individuals

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1 entered your management chain, that you would

2 have the ability to either approve or disapprove

3 of datasets they were considering using for

4 training AI models?

5   MS. HARTNETT: Objection to form.

6   A.   The approval process for datasets

7 is a little more complicated than that. It's a

8 shared responsibility between research and

9 privacy team and our legal team.

10 BY MR. YOUNG

11   Q.   But you would have input on

12 whether or not a certain dataset would be

13 approved or disapproved?

14   MS. HARTNETT: Objection to form.

15   A.   So usually the research director

16 has a point of view on the content of the

17 research project; so whoever is the first line

18 research director is the approver on the research

19 plan. And the datasets are specified as part of

20 that plan.

21   And so we have a, you know

22 essentially a voice into the approval process,

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 1   but all the deciders need to align so it's not a

 2   singular approval.

 3   BY MR. YOUNG

 4   Q.   Have there been any examples of

 5   any datasets that you have expressed concerns

 6   about using for AI training during your time at

 7   Meta?

 8   MS. HARTNETT: Objection to form.

 9   A.   I have definitely asked questions

10   about a number of datasets over time and

11   discussed this with my legal and privacy

12   partners.

13   BY MR. YOUNG

14   Q.   Have you expressed concerns over

15   the use of certain datasets over any of the

16   research scientists or research managers working

17   under your direction at FAIR?

18   MS. HARTNETT: Objection to form and

19   without saying whether you've had any

20   legal discussions, if there's any

21   conversations involving legal

22   attorney-client communications, please

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 1              exclude them from your answer.

 2              A.      It's a regular part of our job to

 3   discuss the choice of datasets for the projects.

 4   I do it on a weekly basis with several research

 5   teams.  Most of these discussions centre around

 6   whether the dataset is the right one to prove our

 7   scientific hypothesis.

 8                      My role is to uphold the bar in

 9   terms of the quality of the research.

10   BY MR. YOUNG

11              Q.      Has anyone expressed concerns to

12   you about use of certain datasets for AI

13   training?

14              MS. HARTNETT:  Objection to form.  And

15              also exclude any attorney-client

16              discussions if there were any.

17              A.      What kind of concern?  I mean,

18   yes.  This is something we discuss on a regular

19   basis.

20   BY MR. YOUNG

21              Q.      As anyone ever expressed concerns

22   to you, who's not a lawyer, about using certain
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